

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

WEPAY GLOBAL PAYMENTS LLC,

Plaintiff,

v.

TESLA, INC.,

Defendant.

CIVIL ACTION NO. 6:22-cv-00224

MOTION BY MATTHEW M. WAWRZYN TO WITHDRAW AS COUNSEL

Pursuant to Rule AT-3, Matthew Michael Wawrzyn moves the Court for leave to withdraw as attorney for Wepay Global Payments LLC (“Wepay”). Wawrzyn submits the following as good cause to support the Court’s order granting Wawrzyn leave to withdraw:

1. Wawrzyn is counsel of record for Wepay in this matter. Wepay’s principal is named William Grecia. Mr. Grecia’s wife is named Lizzette Grecia.

2. Starting October 7, 2022, through both William and Lizzette Grecia on behalf of Wepay, Wepay instructed Wawrzyn that Wepay would be finding substitute counsel for this matter.

3. From October 7, 2022 until the present, Wawrzyn has inquired whether Wepay has obtained substitute counsel. Wepay has declined to respond to Wawrzyn regarding the status of Wepay’s representation. Indeed, Wawrzyn has had no meaningful communication with Wepay since October 7, 2022.

4. On December 22, 2022, William Grecia stated to Wawrzyn that Wawrzyn’s services are terminated. On behalf of Wepay, the Grecias have discharged Wawrzyn. Under Illinois Rule of Professional Conduct 1.16(a)(3), Wawrzyn must withdraw.

5. Wepay is aware of Counsel's intent to withdraw and has discharged Counsel. The last known name, address, and telephone number of Wepay is:

Wepay Global Payments, LLC
221 N. Broad Street, Suite 3A,
Middletown DE, 19709

6. A signature for Wepay has not be obtained, however, because Counsel has been expressly instructed by Wepay not to contact Wepay and Counsel has no meaningful communications with Wepay.

7. Wawrzyn will serve this motion on Defendant and Wepay, as well as William and Lizzette Grecia.

8. The requested withdraw is not for the purposes of delay and will not adversely affect or jeopardize the rights of Wepay. Wepay has had ample opportunity to employ additional counsel and granting this Motion to Withdraw will not jeopardize the rights of Wepay.

Conclusion

Wawrzyn respectfully requests an order granting Matthew Michael Wawrzyn leave to withdraw as counsel for Wepay.

Date: January 18, 2023

Respectfully Submitted,

/s/ Matthew M. Wawrzyn
Matthew M. Wawrzyn (ARDC#6276135)
matt@wawrzynllc.com
WAWRZYN LLC
200 East Randolph Street, Suite 5100
Chicago, IL 60601
(312) 235-3120 (telephone)
(312) 233-0063 (facsimile)

Certificate of Service

I, Matthew Michael Wawrzyn, an attorney, certify that on January 18, 2023, I served the above **Motion** on counsel for Defendant and Wepay, as well as William and Lizzette Grecia.

Date: January 18, 2023

sMatt Wawrzyn
Matthew Michael Wawrzyn